



May 3, 2023

VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deeks-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

Defendants respectfully request leave to submit a reply letter in further support of their letter motion to enjoin Plaintiff's new California lawsuit against Amazon, Barnes & Noble, and other retailers. (ECF No 193.) Plaintiff's opposition letter (filed twice as ECF Nos. 195, 196) misrepresents applicable law and relevant facts, and Defendants request an opportunity to respond. We accordingly request that, if the Court does not outright enjoin the California lawsuit as requested, Defendants be given until and including Monday, May 8 to file a reply letter.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin

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